

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

HEATHER CHAMBERLIN, on behalf of herself and others similarly situated,	:	
	:	1:15-cv-02361 (JBS) (AMD)
	:	The Hon. Ann Marie Donio
Plaintiff,	:	
	:	
vs.	:	Notice of Class Action Settlement
MULLOOLY, JEFFREY, ROONEY & FLYNN, LLP	:	
	:	
Defendant.	:	
	:	

Heather Chamberlin (“Plaintiff”) and Mullooly, Jeffrey, Rooney & Flynn, LLP (“Defendant”) jointly notify this Court that they have reached, in principle, a class action settlement. To this end, they respectfully request that the Court vacate all pending deadlines and allow the parties 30 days within which to file:

1. A class action settlement agreement;
2. A proposed form notice of class action settlement to be disseminated to members of the settlement class;
3. A proposed order preliminarily approving the settlement; and
4. Plaintiff’s unopposed motion to preliminarily approve the class action settlement.

DATED: October 27, 2015

/s/ Jeanne Lahiff

Jeanne Lahiff
New Jersey Bar No. 003700.1987
8 Cayuga Road
Cranford, NJ 07016
Tel: (862) 812-0623
Fax: (866) 842-3303
rsvp2jeanne@gmail.com

/s/ Mitchell L. Williamson

Mitchell L. Williamson
Pressler & Pressler, L.L.P.
7 Entin Road
Parsippany, NJ 07054
Tel: (973) 753-5100
Fax: (973) 753-5353
mwilliamson@presslerpressler.com

Jesse S. Johnson (*pro hac vice*)
Greenwald Davidson Radbil PLLC
5550 Glades Road, Suite 500
Boca Raton, FL 33431
Tel: (561) 826-5477
Fax: (561) 961-5684
jjohnson@gdrlawfirm.com

Attorneys for Defendant

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on October 27, 2015, I electronically filed a copy of the foregoing with the Court using the Clerk of Court's CM/ECF system, which will sent electronic notice to all counsel of record.

/s/ Jeanne Lahiff

Jeanne Lahiff